

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
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SEALED

UNITED STATES OF AMERICA,

JON W. SANFILIPPO
CLERK

Plaintiff,

v.

Case No.

11 - CR259

EARL R. WILLIAMS, JR, a.k.a., "EZ," a.k.a., "Lil Earl,"
MICHAEL WILSON, a.k.a., "Big Mike,"
DAVID OWENS, a.k.a., "DO,"
JERREL L. KITTLER, a.k.a., "Rell,"
LARRY HOOKER, a.k.a., "L Boog,"
CARMELITA LAWRENCE, a.k.a., "C-Bo,"
GARRELL HUGHES, a.k.a. "Rello,"
LATOYA BROWN, a.k.a. "Toya,"
TREMELL GRIGGS,
AMIR LOCKE, a.k.a., "Mir,"
SHERITA HARRIS, a.k.a. "Rita G.,"
LANISHA P. MONTGOMERY, and
CEDRIC GREER, a.k.a., "Ced,"

SEALED

Defendants.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. Beginning sometime in 2008, and continuing until on or about November 15, 2011, in the State and Eastern District of Wisconsin and elsewhere,

EARL R. WILLIAMS, JR., a.k.a., "EZ," a.k.a., "Lil Earl,"
JERREL KITTLER, a.k.a., "Rell,"
LARRY HOOKER, a.k.a., "L Boog,"
DAVID OWENS, a.k.a., "DO," and
MICHAEL WILSON, a.k.a., "Big Mike,"

knowingly and intentionally conspired with each other and with persons known and unknown to the grand jury to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

2. The offense involved 5 kilograms or more of a mixture and substance containing cocaine and 280 grams or more of a mixture and substance containing cocaine base, in the form of "crack" cocaine, Schedule II controlled substances.

3. The primary purpose of the conspiracy was to accumulate money, wealth, and other assets, through the distribution and sale of powder and crack cocaine.

4. As part of the conspiracy:

- a) Certain conspirators provided large amounts of money to obtain large quantities of cocaine from other conspirators inside and outside of the Eastern District of Wisconsin;
- b) Once the cocaine was obtained, the drugs were distributed among members of the conspiracy for wholesale and retail distribution within the Eastern District of Wisconsin. The majority of the cocaine was converted into cocaine base, in the form of "crack" cocaine, by members of the conspiracy;
- c) The conspiracy used various residences to store, package, prepare, and distribute the cocaine and crack cocaine; and

- d) Certain members of the conspiracy possessed firearms to protect the drugs and proceeds of the conspiracy.

All in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 3, 2011, in the State and Eastern District of Wisconsin,

**EARL R. WILLIAMS, JR., a.k.a., "EZ," a.k.a., "Lil Earl," and
LARRY HOOKER, a.k.a., "L Boog,"**

knowingly distributed a mixture and substance containing cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 11, 2011, in the State and Eastern District of Wisconsin,

GARRELL HUGHES, a.k.a. "Rello,"

knowingly distributed a mixture and substance containing cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 10, 2011, in the State and Eastern District of Wisconsin,

MICHAEL WILSON, a.k.a. "Big Mike,"

knowingly possessed with intent to distribute a mixture and substance containing cocaine base in the form of "crack" cocaine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNTS FIVE TO SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates set forth below, in the State and Eastern District of Wisconsin,

EARL R. WILLIAMS, JR., a.k.a., "EZ," a.k.a., "Lil Earl,"

did knowingly engage and attempt to engage in the following monetary transactions by any through a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is the transfer and exchange of United States currency, such property having been derived from a specified unlawful activity, that is conspiracy to possess with intent to distribute controlled substances as charged in Count One.

<u>COUNT</u>	<u>DATE</u>	<u>MONETARY TRANSACTION</u>
5	April 17, 2009	\$11,596
6	September 3, 2009	\$23,334
7	November 13, 2009	\$39,400

All in violation of Title 18, United States Code, Sections 1957 and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Beginning by at least August 2011, and continuing until November 15, 2011, in the State and Eastern District of Wisconsin,

**LATOYA BROWN, a.k.a. "Toya," and
TREMELL GRIGGS**

managed and controlled a place as the owners and occupants.

2. The place was the residence located at 49XX North 57th Street, Milwaukee, Wisconsin.

3. The defendants knowingly and intentionally made the place available for use, with and without compensation, for the purpose of unlawfully storing a mixture and substance containing cocaine, and a mixture and substance containing cocaine base, in the form of "crack" cocaine, Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(2).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Beginning by at least August 2011 and continuing until November 15, 2011, in the State and Eastern District of Wisconsin,

CARMELITA LAWRENCE, a.k.a., "C-Bo,"

managed and controlled a place as the owner and occupant.

2. The place was the residence located at 29XX North 2nd Street, lower, Milwaukee, Wisconsin.

3. The defendant knowingly and intentionally made the place available for use, with and without compensation, for the purpose of unlawfully storing a mixture and substance containing cocaine and a mixture and substance containing cocaine base, in the form of "crack" cocaine, Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 856(a)(2).

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 29, 2011, in the State and Eastern District of Wisconsin,

AMIR LOCKE, a.k.a., "Mir,"

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

Beginning sometime in 2011, in the State and Eastern District of Wisconsin and elsewhere,

LANISHA P. MONTGOMERY,

having knowledge of the actual commission of a felony cognizable by a court of the United States, to wit, conspiracy to distribute controlled substances, concealed and did not as soon as possible make known the same to some judge or other person in civil or military authority under the United States.

All in violation of Title 18, United States Code, Section 4.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 27, 2011, in the State and Eastern District of Wisconsin,

SHERITA HARRIS, a.k.a., "Rita G.,"

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 22, 2011, in the State and Eastern District of Wisconsin,

CEDRIC GREER, a.k.a., "Ced,"

knowingly and intentionally used a communication facility, to wit: a telephone, in committing, or in causing and facilitating the commission of an act or acts constituting the attempted possession with the intent to distribute a controlled substance, a felony under the provisions of Title 21, Chapter 13, Subchapter I, of the United States Code.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE NOTICE

1. Upon conviction of one or more of the controlled substance offenses alleged in Counts Ones to Four, Eight through Ten, Twelve and Thirteen of this Indictment, the defendants shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violations. The properties subject to forfeiture include, but are not limited to, the following:

- A. Custom gold and diamond pendant in the shape of the Monopoly man;
- B. Custom gold and diamond upper teeth covers seized from a burgundy four-door Chrysler 300 bearing Wisconsin license plate 810-SZF at E. Howard Ave., St. Francis, WI, on October 4, 2011;
- C. Cartier eyeglasses with diamonds;
- D. Custom gold backplate for Monopoly man pendant;
- E. One custom-made "EZ" ten karat yellow and gold diamond ring with princess cut;
- F. 2007 Porsche Cayenne, bearing Wisconsin license plate 500-SRE, registered to Angelena Lawrence, bearing VIN WP1A29P78LA48985;
- G. \$1,834 in United States currency seized from Michael Wilson at 10XX E. Walnut St., Milwaukee, WI, on May 9, 2011;
- H. \$1,262.35 in United States currency seized from Michael Wilson at 10XX N. Old World Third St., Milwaukee, WI, on August 27, 2011;
- I. \$3,004 in United States currency seized from Michael Wilson at 18XX N. Farwell Ave., Milwaukee, WI, on September 10, 2011;
- J. \$815 in United States currency seized from Michael Wilson at 1100 block of East Singer Circle, Milwaukee, WI, on August 17, 2011;

- K. \$6,360 in United States currency seized from Williams at 28XX N. Richards St., Milwaukee, WI, on July 22, 1011.
- L. 2002 Volkswagen Passat GLX 4MOTION bearing Wisconsin license 460 RVL and VIN WVWYH63B92E009152 and registered to Angelena Lawrence;
- M. 2004 Volkswagen Phaeton 4.2 bearing VIN WVWAF63D648008504 and registered to Kimeshia Weatherall;
- N. 1999 Mercedes Benz E320 bearing Wisconsin license plate 733-SMF and VIN WDBJF65HXXA826667 and registered to Carmelita Lawrence;
- O. 2004 Infiniti FX45 Sport Utility Vehicle bearing Wisconsin license plate 343SMR, VIN JNRBS08W14X401307 and registered to Kimeshia Weatherall;
- P. 1997 Infiniti Q 45 sedan bearing Wisconsin license plate 185SYD and VIN JNKBY31D8VM006163 and registered to Sheila Howard;
- Q. \$2,980 in United States currency seized from a burgundy four-door Chrysler 300 bearing Wisconsin license plate 810-SZF at E. Howard Ave., St. Francis, WI, on October 4, 2011;
- R. A black Smith and Wesson 9 millimeter pistol seized from a burgundy four-door Chrysler 300 bearing Wisconsin license plate 810-SZF at E. Howard Ave., St. Francis, WI, on October 4, 2011;
- S. A Raven .25 caliber chrome pistol seized from a burgundy four-door Chrysler bearing Wisconsin license plate 810-SZF at E. Howard Ave., St. Francis, WI, on October 4, 2011; and
- T. 2005 Infiniti FX35 Sport Utility Vehicle bearing Wisconsin license plate 845SRH and VIN JNRAS08W75X206163; and registered to Angelena Lawrence;
- U. One 14 karat white gold diamond cluster earring, square design, belonging to Earl R. Williams, Jr.; and
- V. A sum of money equal to the value of the property involved in the offense(s).

2. If any of the property described above, as a result of any act or omission by a

defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to 21 U.S.C. § 853(p).

3. Upon conviction of the offense in violation of Title 18, United States Code, Section 1957, set forth in Counts Five to Seven of this Indictment, the defendant, Earl R. Williams, Jr., shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in the offense or offenses, and any property traceable to such property, including but not limited to:

- A. Custom gold and diamond pendant in the shape of the Monopoly man;
- B. Custom gold and diamond teeth covers;
- C. Cartier eyeglasses with diamonds; and
- D. Custom gold backplate for Monopoly man pendant; and
- E. A sum of money equal to the value of the property involved in the offense(s).

4. If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third person; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be

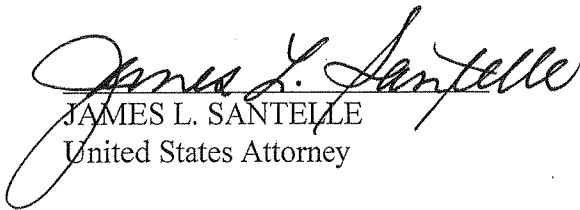
subdivided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

A TRUE BILL:



FOREPERSON

Date: 11/15/11


JAMES L. SANTELLE
United States Attorney